



**Toxics Substance Reduction Plan Summary
For
CHROMIUM (CAS # NA-04)**

**Linery Manufacturing Inc.
87 Campbell Road
Guelph, Ontario
N1H 1B9**

December 3, 2012
Pinchin File: 78035

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EXECUTIVE SUMMARY

Linery Manufacturing Inc. (*Linery*) operates a manufacturing facility at 87 Campbell Road in Guelph. Linery is part of the Linamar corporation and is ISO 9001 and ISO 14001 certified. The facility's most recent external audit was conducted in October 2011. The facility processes steel tube, bar stock, and other components to manufacture Skyjack cylinders, Winergy gear housings, and other components. Processes include cutting, machining, welding, assembly, washing, assembly, inspection and shipping. Linery has prepared this Toxics Substance Reduction Plan for chromium in order to meet its compliance requirements under the Toxics Reduction Act. At this time, no opportunities to reduce the use of chromium at the facility have been identified. Linery has invested significant time, effort, and resources in identifying inefficiencies and sources of scrap metal and non-conforming production generation within its processes for quality reasons. These activities are conducted on a daily basis and are part of the site's continuous improvement process. Linery remains committed to playing a leadership role in the protection of the environment and will review its activities and any technological advances within the metalworking industry in an effort to identify new options to optimize the use of chromium as they become available.

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1.0 BASIC FACILITY INFORMATION

Substance Information		
Name	Chromium (and its compounds)	
CAS #	NA-04	
Facility Information		
Company Name	Linergy Manufacturing Inc.	
Facility Address	87 Campbell Road	
Site Coordinates (main entrance of site)	557298.6 E, 4822095.9 N; Zone 17	
NPRI ID	11790	
MOE ID		
Number of Full-Time Employees in 2011	122	
2-Digit NAICS Code	31-33 Manufacturing	
4-Digit NAICS Code	3336 - Engine, Turbine and Power Transmission Equipment Manufacturing	
Parent Company Information		
Company Name	Linamar	
Company Address	287 Speedvale Avenue West, Guelph, N1H1C5	
Percent Ownership by Parent Company	100%	
Facility Contact Information		
Public Contact	Theresa Sonder Health, Safety & Environmental Coordinator Tel: 519 341 5996, ext. 5579 Fax: 519 341 5997	E-mail: Theresa.Sonder@linamar.com Address – same as facility

2.0 SUBSTANCES REQUIRING PLANS

Chromium (and its compounds) CAS# NA-04

Copper (and its compounds) CAS# NA-06

Manganese (and its compounds) CAS# NA-09

Nickel (and its compounds) CAS# NA-11

3.0 STATEMENT OF INTENT

Linery Manufacturing Inc. is committed to playing a leadership role in protecting the environment. The use of chromium is an integral part of the products that we manufacturer, and it is not technically or economically feasible to reduce beyond the measures already implemented at the facility. We will continue to use these substances in strict accordance with all applicable environmental regulations.

With reference to the Ontario Toxics Reduction Act, the reduction objectives are outlined in Section 3.0 of this Plan Summary for the reportable substance chromium at Linery Manufacturing Inc.

4.0 OBJECTIVES OF THE PLAN & ANY TARGETS

Linery Manufacturing Inc. prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. We will strive to optimize the use of chromium at the facility. As part of the continuous improvement practices at the facility, technical advances will be monitored for new opportunities to reduce the use of chromium in the future.

5.0 OPTIONS TO BE IMPLEMENTED (OR STATEMENT THAT NONE ARE TO BE IMPLEMENTED)

No options have been identified for implementation at this time. In its 4-year manufacturing history, Linery has made significant strides in maximizing its efficiencies in material use and scrap generation. These have been undertaken as part of continuous improvement and are typically motivated by quality considerations, but have resulted in processes that leave little room for improvement under the Toxics Reduction Act.

6.0 CONTENTS OF THIS PLAN SUMMARY REFLECTS PLAN

This Plan Summary accurately reflects the Toxic Substance Reduction Plans dated December 3, 2012, prepared for the substances listed in Section 1.0 of this Summary.

7.0 CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 3, 2012, I certify that I have read the toxic substance reduction plan for chromium and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and the Ontario Regulation 455/09 (General) made under that Act.

 Dec. 10, 2012

Francis Gobbi
General Manager
Linergy Manufacturing

8.0 CERTIFICATION BY LICENSED PLANNER

As of December 3, 2012, I certify that I am familiar with the processes at Linery Manufacturing Inc. that use or create chromium, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the *Toxics Reduction Act, 2009* and the Ontario Regulation 455/09 (General) made under that Act.



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Pinchin Master Report Guide, Ver. 1, May 2007

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